

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

REVIEW OF FEDERAL COMMUNICATIONS	)	
COMMISSION'S TRIENNIAL REVIEW ORDER	)	CASE NO.
REGARDING UNBUNDLING REQUIREMENTS	)	2003-00379
FOR INDIVIDUAL NETWORK ELEMENTS	)	

**AT&T COMMUNICATION OF THE SOUTH CENTRAL STATES, LLC'S**  
**SECOND SET OF INTERROGATORIES (NOS. 113-119)**  
**TO BELL SOUTH TELECOMMUNICATIONS, INC.**

AT&T Communications of the South Central States, LLC ("AT&T"), pursuant to the Kentucky Public Service Commission's Orders issued in this proceeding on October 2, 2003 and November 4, 2003, respectively, hereby serves its Second Set of Interrogatories to BellSouth Telecommunications, Inc. ("BellSouth").

**DEFINITIONS**

1. "BellSouth" means BellSouth Telecommunications, Inc., and its parents, subsidiaries, and affiliates, their present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of BellSouth Telecommunications, Inc.

2. The terms "you" and "your" refer to BellSouth.

3. "CLEC" means a "competitive local exchange carrier," as defined in 47 U.S.C. § 153(26), which is not an "incumbent local exchange carrier" as defined in 47 U.S.C. § 251(h).

4. "AT&T" means AT&T Communications of the South Central States, LLC, its subsidiaries and affiliates, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of AT&T.

5. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

6. The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the possession, custody or control of BellSouth, including, but not limited to, correspondence, memoranda, drafts, workpapers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files; and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

7. The term "communication" means any oral, graphic, demonstrative, telephonic, verbal, electronic, written or other conveyance of information, including, but not limited to, conversations, telecommunications and documents.

8. The term "referring or relating to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving,

dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

9. "And" and "or" as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of these discovery requests any information that would otherwise not be brought within their scope.

10. "Affiliate" or "affiliated" means an entity that directly, or indirectly through one or more intermediaries, controls, or is controlled by, or is under common control with, another entity.

11. The singular as used herein shall include the plural, and vice versa, and the masculine gender shall include the feminine and the neuter.

12. "Identify" or "identifying" or "identification" when used in reference to a natural person means to state:

- a) the full legal name of the person;
- b) the name, title and employer of the person at the time in question;
- c) the present or last known employer of such person;
- d) the present or last known home and business addresses of the person; and
- e) the present home address.

13. "Identify" or "identifying" or "identification" when used in reference to a person other than a natural person means to state:

- a) the full name of the person and any names under which it conducts business;
- b) the present or last known address of the person; and

c) the present or last known telephone number of the person.

14. "Identify" or "identifying" or "identification" when used in reference to a document means to provide with respect to each document requested to be identified by these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

- a) the type of document (e.g., letter, memorandum, etc.);
- b) the date of the document;
- c) the title or label of the document;
- d) the Bates number or other identifier used to number the document for use in litigation;
- e) the identity of the originator;
- f) the identity of each person to whom it was sent;
- g) the identity of each person to whom a copy or copies were sent;
- h) a summary of the contents of the document;
- i) the name and last known address of each person who presently has possession, custody or control of the document; and
- j) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and, if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.

15. "Identify," "identifying" or "identity" when used in reference to a communication means to state the date of the communication, whether the communication was written or oral,

the identity of all parties and witnesses to the communication, the substance of what was said and/or transpired and, if written, the identity of the document(s) containing or referring to the communication.

16. “Hot cut” refers to the entire process necessary to physically transfer from one carrier to another a working voice grade access line that remains working after the transfer.

17. “Bulk Hot Cut” refers to any hot cut(s) performed by BellSouth in which multiple customers of a CLEC are migrated to the CLEC or to a different network configuration (UNE-P to UNE-L), and managed by BellSouth as a joint migration event or project.

18. “Individual Hot Cut” refers to all hot cuts that are not bulk hot cuts.

19. “Access Line” refers to a working analogue voice grade access line used to serve residential and small business customers, or a working voice grade line served by Digital Loop Carrier Systems (“DLC”) that is used for serving residential and small business customers. “Access Line” does not, for example, include high capacity systems such as DS1 and ISDN-PRI.

20. Digital Loop Carrier (“DLC”) includes IDLC (integrated) UDLC (Universal) and NGDLC (Next Generation).

21. “ILEC” refers to Incumbent Local Exchange Carrier.

22. “CO” refers to Central Office.

23. “CWINS” refers to Customer Wholesale Interconnection Services.

24. “MDF” refers to Main Distribution Frame.

25. “UNE” refers to Unbundled Network Element.

26. “UNE-L” refers to Unbundled Network Element-Loop.

27. “UNE-P” refers to Unbundled Network Element –Platform.

28. “LATA” refers to Local Access and Transport Area.

29. Unless otherwise stated, information requests refer all states in BellSouth's nine-state region.

### **GENERAL INSTRUCTIONS**

1. If you contend that any response to any Interrogatory may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:

- a) the privilege asserted and its basis;
- b) the nature of the information withheld; and
- c) the subject matter of the document, except to the extent that you claim it is privileged.

2. These discovery requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information, which is physically within your possession, custody or control as well as in the possession, custody or control of your agents, attorneys, or other third parties from which such documents may be obtained.

3. If any Interrogatory cannot be answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.

4. These interrogatories are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these interrogatories subsequently become known.

5. For each Interrogatory, provide the name of the company witness(es) or employee(s) responsible for compiling and providing the information contained in each answer.

6. To the extent BellSouth has previously provided a response to any Interrogatory, which prior response is responsive to any of the following Interrogatories, in BellSouth's nine-state region or any other state in proceedings in which BellSouth and AT&T are parties, BellSouth need not respond to such Interrogatory again, but rather may respond to such Interrogatory by identifying the prior response to such Interrogatory by state, proceeding, docket number, date of response, and the number of such response. If such prior response does not respond to the Interrogatory contained below in its entirety, you should provide all additional information necessary to make your answers to these Interrogatories complete.

### **INTERROGATORIES**

- 113) Describe BellSouth's ordering requirements of CLECs for requests to purchase switching from a wholesale provider (e.g. another CLEC) and purchase an unbundled loop from BellSouth. Describe in detail *any* differences between these requirements and BellSouth's ordering requirements of CLEC's requests to purchase an unbundled loop for use with its own (CLEC) switch. If any part of BellSouth's response directs AT&T to a document/documents on BellSouth's website, include specific page numbers of the document/documents in which the answer is located.
- 114) Describe BellSouth's provisioning requirements of CLECs for requests to purchase switching from a wholesale provider (e.g. another CLEC) and purchase an unbundled loop from BellSouth. Describe in detail *any* differences between these requirements and BellSouth's provisioning requirements of CLEC's requests to purchase an unbundled loop for use with its own (CLEC) switch. If any part of BellSouth's response directs AT&T to a document/documents on BellSouth's website, include specific page numbers in which the answer is located.

- 115) For each day between January 2002 and September 2003, or for the latest period for which information is available, and for each CO identified in answer to Interrogatory No. 1, provide the number access lines migrated to UNE-P that have been completed by BellSouth, disaggregated as follows:
- (a) the total number of access lines migrated to UNE-P;
  - (b) the total number of access lines migrated from BellSouth retail to UNE-P;
  - (c) the total number of access lines migrated from resale to UNE-P; and
  - (d) the total number of access lines migrated from UNE-L to UNE-P.
- 116) Has BellSouth conducted any studies to indicate that it can meet the future demand for hot cuts that would be caused by an elimination of unbundled switching? If yes, please provide all documents related to the study.
- 117) For each day between January 2002 and September 2003, or for the latest period for which information is available, and for each CO identified in answer to Interrogatory No. 1, provide the number of access lines migrated away from CLECs to BellSouth retail that have been completed by BellSouth, disaggregated as follows:
- (a) the total number access lines on UNE-P migrated from CLECs to BellSouth retail;
  - (b) the total number access lines on UNE-L migrated from CLECs to BellSouth retail; and
  - (c) the total number access lines on resale migrated from CLECs to BellSouth retail.
- 118) BellSouth's response to Interrogatory No. 20, in Attachment 20 provides the number and percentage of copper loop serving arrangements. For each such entry in Attachment 20,



provide the number of percentage of such loops converted to T1 (DS1) level interfaces through the use of DLCs located in the central office before they enter the local switch.

119) For each switch located within the central offices identified in response to Interrogatory No. 1, provide the following information:

- (a) the percentage of originating calls completed to other subscribers on the switch (intra-office calls);
- (b) the percentage of originating calls completed to other "local" subscribers (inter-office local calls);
- (c) the percentage of originating calls completed to intra-LATA toll destinations (intra-LATA toll calls); and
- (d) the percentage of originating calls completed to inter-LATA toll destinations, a single total percentage:
  - (i) Inter-LATA, intra-state plus;
  - (ii) Inter-LATA inter-state plus; and
  - (iii) International (inter-LATA toll calls).

Submitted this 24<sup>th</sup> day of November, 2003.



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